



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

VIA UPS

Mr. Ron Dandrea
President
Bedford Materials Company, Inc.
7676 Allegheny Road
Manns Choice, PA 15550

**Re: Notice of Violation Response
Compliance Evaluation Inspection
August 25, 2014
EPA ID No. PAD057631889**

Docket Number: R3-15-NOV-RCRA-036

Dear Mr. Dandrea:

On September 16, 2015, the U.S. Environmental Protection Agency, Region III ("EPA") issued a Notice of Violation ("NOV") to Bedford Materials Company, Inc. ("Bedford" or "Facility") in regards to the Compliance Evaluation Inspection ("CEI") that occurred on August 25, 2014. The NOV addressed several issues, including the labeling of satellite accumulation containers.

On October 6, 2015, you submitted a response to this NOV. In your response, regarding Violation #1, the following procedure was described for the satellite accumulation containers:


"Residual from coatings used at Bedford can stick to the buckets. The coatings are like paint that as they dry, lose the characteristics that regulate them as a hazardous material."

This procedure, in and of itself, is not a violation, but can lead to possible violations if the containers are not empty according to the federal regulations. Please refer to 40 CFR §261.7, for guidance on what is considered RCRA empty.

Thank you for following up with the EPA in a timely manner after receiving the NOV. A response to this correspondence is not required. If you have any questions or concerns, please feel free to contact the EPA. Any response to this matter can be addressed to:

Eric Greenwood
U.S. Environmental Protection Agency – Region III
RCRA Office of Land Enforcement (3LC70)
1650 Arch Street
Philadelphia, PA 19103
greenwood.eric@epa.gov
(p): 215-814-2057

Sincerely,

A handwritten signature in cursive script, reading "Carol Amend", written over a horizontal line.

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Date 10/26/15

Enclosure

cc: M. Gross, PADEP (Central Office) w/o Enclosure
P. Belgiovane (3LC70) w/o Enclosure
E. Greenwood (3LC70) w/o Enclosure